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August 31, 2018

**VIA ECF**

Hon. Kenneth M. Karas, U.S. District Judge  
United States District Court  
Southern District of New York  
The Hon. Charles L. Brieant, Jr. Courthouse  
300 Quarropas Street, Chambers 533  
White Plains, NY 10601-4150

Re: *Broidy Capital Management LLC v. Benomar*, No. 18-CV-6615-KMK  
**Letter Motion for Extension of Time to Respond to Complaint**

Dear Judge Karas:

I represent the Defendant, Jamal Benomar, in the above-referenced matter. With the consent of Plaintiffs' counsel, I write to request an extension of the deadline by which the Defendant must answer or otherwise respond to Plaintiffs' Complaint.

Plaintiffs filed their Complaint on July 23, 2018. Dkt. 1. Prior to the filing of the Complaint, Mr. Benomar, a career international diplomat, left on foreign travel and has not yet returned. On August 20, 2018, a process server left the summons and Complaint in this case on Mr. Benomar's doorstep. Defendant agreed with Plaintiffs that Defendant would not challenge this service if the Plaintiffs would consent to an extension to respond to the Complaint to September 28, 2018. Plaintiffs consented. The current deadline to respond would otherwise be September 10, 2018.

This extension is necessary to allow adequate time to prepare a responsive pleading. Defendant is still traveling abroad, but plans to return to New York in the coming weeks. I have not yet had an opportunity to meet with my client in person to review the allegations with him, much less to evaluate the available evidence, responses, and motions. In addition, I (and others working on the case) will be taking numerous days off in September to observe the upcoming religious holidays.

This is the first request for an extension of this deadline. Mr. Wolosky, Plaintiffs' counsel, has agreed to the extension. *See* Attachment A. In addition, in Plaintiffs' "Letter Motion for Informal Discovery Conference" (Dkt. 8) filed on August 29, 2018, Mr. Wolosky confirmed that "Defendant will not challenge service of the Complaint and will answer or otherwise respond to the Complaint by September 28, 2018."

Thank you for your consideration of this request.

Respectfully submitted,

/s/ Abbe David Lowell

Abbe David Lowell

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